



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

FJN/JPL/NDB/RMP
F. #2019R00935 / OCDETF #NY-NYE-874H

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 20, 2023

By ECF and Hand

The Honorable Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Mohammad Bazzi
Criminal Docket No. 23-041 (DLI)

Dear Judge Irizarry:

The government respectfully submits this letter to provide a joint status report, as directed by the Court. To date, the government has begun the production of discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure, and it will continue to do so.¹ Defense counsel has asked the government to provide a timeframe within which it will complete the production of Rule 16 discovery, and for confirmation as to whether discovery will implicate and potentially involved classified material. At this time, the government anticipates that it will substantially complete its production of non-classified discovery in the next 30 to 45 days. With respect to classified material, the government is still ascertaining whether any proceedings will be necessary pursuant to the Classified Information Procedures Act. The government will provide a further update by the time of next week's status conference.

¹ Earlier this afternoon, recently retained defense counsel returned an executed copy of the protective order entered by Your Honor and a stipulation concerning the production of draft transcripts and translations of communications.

The parties have also begun preliminary discussions concerning a potential resolution of this case short of trial. Those discussions are ongoing.

Very truly yours,

BREON PEACE
United States Attorney

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cc: Clerk of the Court (DLI) (by ECF)
Defense counsel (by ECF)